



HUNTON & WILLIAMS LLP
RIVERFRONT PLAZA, EAST TOWER
951 EAST BYRD STREET
RICHMOND, VIRGINIA 23219-4074

TEL 804 • 788 • 8200
FAX 804 • 788 • 8218

KEVIN J. FINTO
DIRECT DIAL: 804-788-8568
EMAIL: kfinto@hunton.com

FILE NO: 68810.000002

January 17, 2008

BY ELECTRONIC AND FIRST CLASS MAIL

Mr. Terry Darton
Virginia Department of Environmental Quality
Northern Virginia Regional Office
13901 Crown Court
Woodbridge, VA 22193



JAN 22 2008

Northern Va. Region
Dept. of Env. Quality

Re: Implementation of Stack Merge Project

Dear Mr. Darton:

I am writing on behalf of Mirant Potomac River, LLC to provide comments on the two stack permit proposed by the State Air Pollution Control board for the Potomac River Generating Station ("PRGS"). Mirant will be submitting more comprehensive comments before January 29.

The proposed permit authorizes the stack merge project, but it does not provide a time frame for the project to take place. Pursuant to PJM rules, Mirant can only perform maintenance on the boilers during scheduled outages. Mirant is not permitted to schedule outages during the peak summer season. In order for the PRGS to meet PJM requirements, merging of the stacks will take place during outages occurring on a staggered time frame. First, stacks 3, 4 and 5 will be merged into Merged Stack 4 ("MS4"). Once that portion of the project is complete, stacks 1 and 2 will be merged into Merged Stack 1 ("MS1"). It is anticipated that MS4 will be completed during an outage scheduled for the spring of 2008. MS1 will be completed during an outage scheduling during the fall of 2008.

After MS4 is completed but before MS1 is completed, an interim emission limitation must be imposed to allow operation of the plant in a manner that will protect the National Ambient Air Quality Standards ("NAAQS") for SO₂. Mirant proposes that the following language be included to address operations between the two stages of the project.

Interim limitations. The Permittee shall notify the DEQ of the completion of each stack merger. Between the completion of the merge of stacks 3, 4 and 5



Michael G. Dowd, Esq.
January 17, 2008
Page 2

and the completion of the merge of stacks 1 and 2, the Permittee shall not operate under the following scenarios.

1 cycle + 1 base only

2 cycle + 1 base only

2 cycle + 2 base only

Where cycle = units 1 or 2
base = units 3, 4, or 5

Moreover, any time unit 1 or unit 2 is operating, the compliant emission rate for SO₂ shall be 0.30 lbs/MMBTU. This condition shall be void once the merge of stacks 1 and 2 is complete.

If you have any questions about this, or need any additional information about the possible timing and implementation of the stack merge project, please call me at 804-788-8568.

Sincerely,

A handwritten signature in black ink, appearing to read "Kevin J. Finto", with a stylized flourish at the end.

Kevin J. Finto

cc: James Sydnor
Michael Dowd, Esq.
James Golden
Michael Kiss
Walter Stone, Esq.
David Cramer
David Shea
Andrea Wortzel, Esq.